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## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF MICHIGAN

In re: Chapter 7

Barfly Ventures, LLC

Hon. James W. Boyd

Jointly Administered

Case No. 20-01947

Debtors.

# NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND DOCUMENTS

PLEASE TAKE NOTICE that Hailey R. Kimball-Dexter of Jaffe, Raitt, Heuer & Weiss, P.C. appears, pursuant to Fed. R. Bankr. P. 9010(b) and 11 U.S.C. § 1109(b), as counsel to Thomas Bruinsma, in his capacity as Chapter 7 Trustee of Barfly Ventures, LLC et. al. ("Trustee").

PLEASE TAKE FURTHER NOTICE that Trustee requests, pursuant to Fed. R. Bankr. P. 2002 and 11 U.S.C. § 1109(b), that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the address, telephone number, facsimile number, and email address indicated:

Hailey R. Kimball-Dexter, Esq. Jaffe, Raitt, Heuer & Weiss, PC 27777 Franklin Road, Suite 2500 Southfield, Michigan 48034 Telephone: (248) 351-3000

Facsimile: (248) 351-3082 Email: <a href="mailto:hkimball@jaffelaw.com">hkimball@jaffelaw.com</a>

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), this demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure, but also includes all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before this Court with respect to the above-referenced bankruptcy proceedings, whether formal or informal, whether written or

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oral, and whether transmitted or conveyed by U.S. mail, electronic mail, courier service, hand

delivery, telephone, facsimile transmission, telegraph, telex, or otherwise.

PLEASE TAKE FURTHER NOTICE that Trustee intends that neither this Notice of

Appearance and Request for Service of Papers nor any later appearance, pleading, claim or suit

shall waive: (i) Trustee's right to have final orders in non-core and certain core matters entered

only after de novo review by a District Court Judge; (ii) Trustee's right to trial by jury in any

proceeding so triable in any case, controversy, or proceeding related to these bankruptcy

proceedings; (iii) Trustee's right to have the District Court withdraw the reference in any matter

subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions,

defenses, setoffs, or recoupments to which Trustee is or may be entitled under agreements, in law

or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Trustee

reserves.

Dated: August 2, 2021

**JAFFE RAITT HEUER & WEISS, P.C.** 

By: /s/Hailey Kimball-Dexter

Hailey Kimball-Dexter (P81031)

Jay L. Welford (P34471)

Paul R. Hage (P70460)

27777 Franklin Road, Suite 2500

Southfield, MI 48034

Telephone: (248) 351-3000

jwelford@jaffelaw.com

phage@jaffelaw.com

hkimball@jaffelaw.com

Counsel to Thomas Bruinsma, in his capacity as Chapter 7 Trustee of Barfly

Ventures, LLC et. al.

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## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF MICHIGAN

In re:	Chapter 7
	Hon. James W. Boyd
Barfly Ventures, LLC	Jointly Administered
	Case No. 20-01947
Debtors.	

Dated: August 2, 2021

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2021, 2021, I caused to be served a copy of the *Notice*Of Appearance And Request For Service Of Notices And Documents and this Certificate of

Service by using the Court electronic filing system which will send notification of such filing to all parties listed on the ECF list in the above-captioned case.

#### JAFFE RAITT HEUER & WEISS, P.C.

By: /s/Hailey Kimball-Dexter
Hailey Kimball-Dexter (P81031)
Jay L. Welford (P34471)
Paul R. Hage (P70460)
27777 Franklin Road, Suite 2500
Southfield, MI 48034
Telephone: (248) 351-3000
jwelford@jaffelaw.com
phage@jaffelaw.com
hkimball@jaffelaw.com

Counsel to Thomas Bruinsma, in his capacity as Chapter 7 Trustee of Barfly Ventures, LLC et. al.